

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CASE NO. 20-10334 (TPA)
JOSEPH MARTIN THOMAS,	:	CHAPTER 11
Debtor.	:	Hearing Date & Time: July 16, 2020 @ 9:30 a.m.
JOSEPH MARTIN THOMAS,	:	Response Date: June 12, 2020
v.	:	JUDGE AGRESTI
NO RESPONDENT.	:	RELATED TO DOCUMENT NO. 48

**CERTIFICATION OF NO OBJECTION REGARDING**  
**APPLICATION TO EMPLOY SPECIAL COUNSEL**  
**RELATED BACK TO THE PETITION DATE (Document No. 48)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading to the Application to Employ Special Counsel Related Back to the Petition Date filed May 26, 2020 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing with Response Deadline, objections to the Motion were to be filed and served no later than June 12, 2020.

It is hereby respectfully requested that the Order attached to the Application be entered by the Court.

Dated: June 15, 2020

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

BY: /s/Michael P. Kruszewski  
Michael P. Kruszewski, Esquire  
PA Id. No. 91239  
The Quinn Law Firm  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222  
Facsimile: 814-833-6753  
E-Mail: mkruszewski@quinnfirm.com  
Counsel for Debtor